

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

GEORGE A. MENOLD, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

NAVIENT CORPORATION, JOHN F.
REMONDI, and SOMSAK CHIVAVIBUL,

Defendants.

Case No. 1:16-cv-00075-GMS

CLASS ACTION

TORE HEINZ MARKUS JAGRELIUS,
Individually and On Behalf of All Others
Similarly Situated,

Plaintiff,

v.

NAVIENT CORPORATION, JOHN F.
REMONDI, and SOMSAK CHIVAVIBUL,

Defendants.

Case No. 1:16-cv-00084-GMS

CLASS ACTION

POLICEMEN'S ANNUITY & BENEFIT
FUND OF CHICAGO, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

NAVIENT CORPORATION, JOHN F.
REMONDI, JOHN KANE, SOMSAK
CHIVAVIBUL, WILLIAM M.
DIEFENDERFER, III, ANN TORRE BATES,
DIANE SUITT GILLELAND, LINDA
MILLS, BARRY A. MUNITZ, STEVEN L.
SHAPIRO, JANE J. THOMPSON, BARRY L.
WILLIAMS, CREDIT SUISSE SECURITIES
(USA) LLC, DEUTSCHE BANK

Case No. 1:16-cv-00112-GMS

CLASS ACTION

SECURITIES INC., J.P. MORGAN
SECURITIES LLC, RBC CAPITAL
MARKETS, LLC, BARCLAYS CAPITAL
INC., GOLDMAN, SACHS & CO.,
MERRILL LYNCH, PIERCE, FENNER &
SMITH INCORPORATED, RBS
SECURITIES INC., AND WELLS FARGO
SECURITIES, LLC,

Defendants.

AVERMENT OF COUNSEL IN ACCORDANCE WITH LOCAL RULE 7.1.1

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Abbett Affiliated Fund, Inc., Lord Abbett
Equity Trust – Lord Abbett Calibrated Mid
Cap Value Fund, Lord Abbett Bond Debenture
Fund, Inc., and Lord Abbett Investment Trust –
Lord Abbett High Yield Fund (collectively, the
“Lord Abbett Funds”) and Proposed Lead
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* *Pro hac vice* application forthcoming

[Additional counsel listed on signature page]

Dated: April 11, 2016

To the extent Local Rule 7.1.1 applies, the undersigned, one of the attorneys for movants Lord Abbett Affiliated Fund, Inc., Lord Abbett Equity Trust – Lord Abbett Calibrated Mid Cap Value Fund, Lord Abbett Bond Debenture Fund, Inc., and Lord Abbett Investment Trust – Lord Abbett High Yield Fund (collectively, the “Lord Abbett Funds”) hereby states that the statutory deadline for putative class members to move the Court for appointment as lead plaintiff in accordance with 15 U.S.C. § 78u- 4(a)(3)(A)(ii) has not yet passed and therefore movants are unable to identify potentially opposing parties prior to the filing of this motion. Accordingly, the Lord Abbett Funds respectfully request that the requirements of Local Rule 7.1.1 be deemed to have been satisfied here.

Dated: April 11, 2016

Respectfully submitted,

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